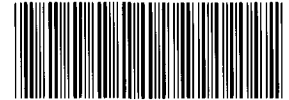




CR RECORDS

## INTEROFFICE MEMORANDUM



000061822

DATE: June 4, 1996

TO: J. A. Ciucci, Waste Storage & Disposal, Bldg. T130B, X5841

FROM: J. P. Schmuck, Compliance, Bldg. T893B, X4092 *JPS*

SUBJECT: RETURN OF DRUMMED OPERABLE UNIT 7 INVESTIGATIVE DERIVED MATERIAL TO the PRESENT LANDFILL – JPS-001-96

Attached please find copies of the correspondence that led to the Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency's (EPA) approval to return Operable Unit (OU) 7 Field Investigative Derived Materials (IDM) to the Present Landfill.

Under the Interagency Agreement and in the future under the Rocky Flats Cleanup Agreement, CDPHE and EPA will continue to have broad discretion in matters related to contaminated environmental media. The definition of contaminated environmental media includes the drums of OU 7 IDM.

The basis for this discretion lies in the contained-in policy. In either pure RCRA, pure CERCLA or a combined RCRA/CERCLA context, the contained-in policy parallels the mixture and derived-from rules with one significant exception. Unlike the mixture and derived-from rules, under the contained-in policy it is not necessary for the regulatory agency(s) to formally delist pursuant to §261.22. In contrast, the agency(s) need only determine that the media "no longer contains" the hazardous waste. The application of the "contained-in policy" was upheld in Chemical Waste Management vs. U.S. EPA, 869 F.2d 1526, 1540 (D.C. Cir. 1989).

Typically, the "no longer contains" determination is in the form of a risk evaluation based on a residential exposure scenario and a  $10^{-6}$  excess lifetime cancer risk as the **point of departure**. In regard to the OU 7 IDM, persuasive arguments convinced CDPHE and EPA to depart from the residential/ $10^{-6}$  starting point embodied in the F029 procedure and to determine that the IDM should be returned to its point of origin.

Specifically:

- The IDM originated in, and remains similar to the contents of the landfill;
- The direct exposure pathway will not exist when the landfill is capped; and
- The landfill is subject to an Interim Measure/Interim Remedial Action and ultimately a Corrective Action Decision/Record of Decision.

This departure is clearly within either CDPHE or EPA authority. Specifically, the National Contingency Plan provides an acceptable risk range of  $10^{-4}$  to  $10^{-6}$ . (See 40 CFR §300.430(e)(2)(i)(A)(2)). Additionally, the continuing CDPHE and EPA authority over the present operations at the landfill and over the ultimate closure of the landfill provides agency opportunity to evaluate the composition of the wastes placed in the landfill over the life of the landfill when making final remedial decisions.

In conclusion, CDPHE and EPA approval is an appropriate exercise of discretion. The disposal of the drums and the characteristics of the material will be documented as part of the IM/IRA record and will be incorporated, as appropriate, into the final decision document.

ADMIN RECCRD

BZ-A-000407

1/18

J. A. Ciucci  
June 4, 1996  
JPS-001-96  
Page 2

Consistent with that approval, please arrange to return (i.e., dispose) the contents of the OU 7 IDM to the present landfill at your earliest convenience. A list of the 224 drum numbers is attached for your information. Please note that although the Department of Energy/Rocky Flats Field Office's request discussed 237 drums, 13 of the drums contained water which was managed at the Sitewide Treatment Facility, Building 891.

jlm

cc:  
M. C. Broussard  
D. E. Gomer  
D. R. Lobdell  
M. K. Pepping  
A. P. Power  
A. M. Tyson

2

# STATE OF COLORADO

Roy Romer, Governor  
Patti Shwayder, Acting Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

## HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

4300 Cherry Creek Dr. S.  
Denver, Colorado 80222-1530  
Phone (303) 692-3300  
Fax (303) 759-5355

222 S. 6th Street, Room 232  
Grand Junction, Colorado 81501-2768  
Phone (303) 248-7164  
Fax (303) 248-7198



Colorado Department  
of Public Health  
and Environment

October 3, 1995

Steve Slaten  
IAG Project Coordinator-ER  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden CO 80402-0928

**RE: Field Investigation-Derived Materials (IDM) at Operable Unit 7**

Dear Mr. Slaten:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division and the Environmental Protection Agency have reviewed DOE's request to return Field Investigation-Derived Materials generated during the OU 7 Phase I RFI/RI to the present landfill. This proposal is approved and should be incorporated into the final Interim Measure/Interim Remedial Action (IM/IRA) for OU 7.

If you have any questions regarding the approval of this proposal, please contact Carl Spreng at 692-3358.

Sincerely,

Joe Schieffelin  
Rocky Flats Unit Leader  
Hazardous Waste Control Program

cc: Kurt Muenchow, DOE  
Steve Hahn, Kaiser-Hill  
Laurie Peterson-Wright, RMRS  
Bill Fraser, EPA  
Laura Perrault, AGO  
Steve Tarlton, RFPU



## Department of Energy

ROCKY FLATS FIELD OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

APR 28 1995

95-DOE-08198

Mr. Martin Hestmark  
U. S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

Mr. Joe Schieffelin, Unit Leader  
Hazardous Waste Facilities  
Colorado Department of Public Health and the Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

Enclosed for your approval is the Department of Energy's (DOE) proposal to return Phase 1 Field Investigation-Derived Material (IDM) to the present landfill before the cap is put in place. This proposal is consistent with a letter (95-DOE-08227) previously submitted by the Department of Energy (DOE) on March 16, 1995.

During the Operable Unit (OU) No. 7 Phase I Field Investigation, 237 drums of IDM were generated. Of the 237 drums, 64 drums contain RCRA hazardous waste and the remaining 173 drums contain no RCRA hazardous waste.

The DOE proposes that the drums of non-hazardous IDM be disposed in accordance with the site procedure 4-F99-ENV-OPS-FO.23.

The 64 drums of RCRA hazardous waste IDM are designated as RCRA hazardous solely because they contain F039 waste and because the RCRA risk analysis ratio is greater than one. This risk evaluates the human exposure pathways of direct ingestion of soil, dermal absorption of constituents from soil, inhalation of suspended (airborne) soil, and ingestion of food grown in contaminated soil. None of the drums have any other associated waste codes. Because the OU 7 landfill is undergoing a RCRA equivalent closure, and because this waste came directly from characterizing the landfill, we propose returning this waste to the landfill before the cap is put in place.

By returning the RCRA hazardous waste IDM to the landfill, the RCRA and CERCLA constituents in the IDM will be controlled to the same extent as the waste already there. Once the landfill is capped the soil pathway will no longer exist and the disposition is protective of human health and the environment. In addition, this solution is cost effective and provides waste minimization by avoiding the introduction of different constituents to a new disposal site.

M. Hestmark & J. Schieffelin  
95-DOE-08198

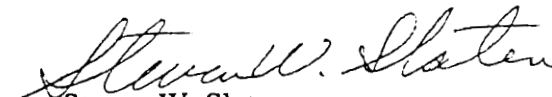
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APR 28 1995

Enclosed is a summary of the drummed IDM proposed to be put back in the landfill and each drum's characterization information.

Since this issue has an impact on the content of the IM/TRA decision document, the Department of Energy would appreciate a response two weeks from receipt of this letter.

Sincerely,

  
Steven W. Slaten  
IAG Project Coordinator  
Environmental Restoration

Enclosure

cc w/o Enclosure:

J. Ahlquist, EM-452, HQ  
C. Gesalman, EM-453, HQ  
H. Belencan, EM-453, HQ  
L. Ekman, EM-453, HQ  
K. Klein, OOM, RFFO  
J. Roberson, AMER, RFFO  
F. Lockhart, ER, RFFO  
J. Wienand, ER, RFFO  
V. Witherill, ER, RFFO  
B. Thatcher, ER, RFFO  
P. Witherill, ER, RFFO  
B. Williamson, ER, RFFO  
G. Doyle, WMD, RFFO  
S. Stiger, EG&G  
E. Mast, EG&G  
L. Peterson-Wright, EG&G  
Admin Records

Drum Number and Designation	Constituents	RCRA Risk Analysis Carcinogenic Ratio	RCRA Risk Analysis Noncarcinogenic Ratio	Inclusive Risk Analysis Noncarcinogenic Ratio	LDR Treatment Standard	Units	Analytical Results	Units	Comments
2600ST Non-RCRA hazardous	Cumulative Risks	0.000284	0.000305	2.413					
	Constituents								
	Barium								
	Cadmium	0.000284		1.045	7.6	mg/L	330	mg/kg	16.5 mg/L TCLP
2951ST Non-RCRA hazardous	Cumulative Risks		0.000152	1.594	0.19	mg/L	1.1	mg/kg	0.22 mg/L TCLP
	Constituents								
	Nitrate/Nitrite								
3007ST RCRA hazardous	Cumulative Risks	0.000224	0.000224	1.594	NA	mg/kg	200	mg/kg	
	Constituents								
	Benzo(a)anthracene	0.175							
	Benzo(a)pyrene	1.518			3.4	mg/kg	0.15	mg/kg	
	Benzo(b)fluoranthene	0.245			3.4	mg/kg	0.13	mg/kg	
3024ST RCRA hazardous	Cumulative Risks	2.074	1.009		6.8	mg/kg	0.21	mg/kg	
	Constituents								
	Barium								
	Benzo(a)anthracene	0.174	1.003		7.6	mg/L	317	mg/kg	15.85 mg/L TCLP
	Benzo(a)pyrene	1.690			3.4	mg/kg	0.149	mg/kg	
	Benzo(b)fluoranthene	0.171			3.4	mg/kg	0.145	mg/kg	
	Bis(2-ethylhexyl)phthalate	0.121			6.8	mg/kg	0.146	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.195			28	mg/kg	0.281	mg/kg	
3023ST RCRA hazardous	Cumulative Risks	4.806	1.036		3.4	mg/kg	0.167	mg/kg	
	Constituents								
	Barium								
	Benzo(a)anthracene	0.459	1.001		7.6	mg/L	316	mg/kg	15.80 mg/L TCLP
	Benzo(a)pyrene	3.060			3.4	mg/kg	0.393	mg/kg	
	Bis(2-ethylhexyl)phthalate	0.997			3.4	mg/kg	0.262	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.293			28	mg/kg	2.327	mg/kg	
2995ST RCRA hazardous	Cumulative Risks	3.091	0.000608		3.4	mg/kg	0.251	mg/kg	
	Constituents								
	Aroclor-1242	306.306							
	Benzo(a)pyrene	2.219			10	mg/kg	1.3	mg/kg	
					3.4	mg/kg	0.19	mg/kg	

Drum Number and Designation	Constituents	RCRA Risk Analysis Carcinogenic Ratio	RCRA Risk Analysis Noncarcinogenic Ratio	Inclusive Risk Analysis Noncarcinogenic Ratio	LDR Treatment Standard	Units	Analytical Results	Units	Comments
2963ST RCRA hazardous	Benzo(b)fluoranthene	0.292			6.8	mg/kg	0.25	mg/kg	
	Bis(2-ethylhexyl)phthalate	0.111			28	mg/kg	0.26	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.164			3.4	mg/kg	0.14	mg/kg	
	Cumulative Risks								
	See 2982ST, 2996ST, 2997ST, 3031ST and 3032ST								
2960ST RCRA hazardous	Constituents		8.067	0.00704					
	Benzo(a)anthracene	0.521							
	Benzo(a)pyrene	4.453			3.4	mg/kg	0.447	mg/kg	
	Benzo(b)fluoranthene	0.767			3.4	mg/kg	0.381	mg/kg	
	Dibenzo(a,h)anthracene	1.991			6.8	mg/kg	0.657	mg/kg	
2961ST RCRA hazardous	Indeno(1,2,3-cd)pyrene	0.204			8.2	mg/kg	0.171	mg/kg	
	Cumulative Risks		9.742	0.00765	3.4	mg/kg	0.175	mg/kg	
	Constituents								
	Aroclor -1254	6.833							
	Benzo(a)anthracene	0.199			10	mg/kg	0.029	mg/kg	
2982ST RCRA hazardous	Benzo(a)pyrene	2.172			3.4	mg/kg	0.17	mg/kg	
	Benzo(b)fluoranthene	0.253			3.4	mg/kg	0.186	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.176			6.8	mg/kg	0.216	mg/kg	
	Cumulative Risks		65.84	0.084	3.4	mg/kg	0.151	mg/kg	
	Constituents								
2981ST RCRA hazardous	Aroclor -1254	34.165							
	Benzo(a)anthracene	0.424			10	mg/kg	0.145	mg/kg	
	Benzo(a)pyrene	4.336			3.4	mg/kg	0.363	mg/kg	
	Benzo(b)fluoranthene	0.447			3.4	mg/kg	0.371	mg/kg	
	Bis(2-ethylhexyl)phthalate	0.497			6.8	mg/kg	0.383	mg/kg	
2981ST RCRA hazardous	Dibenzo(a,h)anthracene	3.811			28	mg/kg	1.159	mg/kg	
	Hexachlorobenzene	21.206			8.2	mg/kg	0.326	mg/kg	
	Indeno(1,2,3-cd)pyrene				10	mg/kg	0.433	mg/kg	
	Cumulative Risks		167.71	0.00452	3.4	mg/kg	0.353	mg/kg	
	Constituents								

Drum Number and Designation	Constituents	RCRA Risk Analysis Carcinogenic Ratio	RCRA Risk Analysis Noncarcinogenic Ratio	Inclusive Risk Analysis Noncarcinogenic Ratio	LDR Treatment Standard	Units	Analytical Results	Units	Comments
2980ST RCRA hazardous	Aroclor -1254	10.642			10	mg/kg	0.0452	mg/kg	
	Benzo(a)anthracene	0.316			3.4	mg/kg	0.271	mg/kg	
	Benzo(a)pyrene	3.008			3.4	mg/kg	0.258	mg/kg	
	Benzo(b)fluoranthene	0.379			6.8	mg/kg	0.325	mg/kg	
	Dibenzo(a,h)anthracene	2.111			8.2	mg/kg	0.181	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.231			3.4	mg/kg	0.198	mg/kg	
	Cumulative Risks	16.582	0.00481						
2979ST RCRA hazardous	Aroclor -1254	10.620			10	mg/kg	0.0451	mg/kg	
	Benzo(a)anthracene	0.302			3.4	mg/kg	0.259	mg/kg	
	Benzo(a)pyrene	2.842			3.4	mg/kg	0.243	mg/kg	
	Benzo(b)fluoranthene	0.360			6.8	mg/kg	0.308	mg/kg	
	Dibenzo(a,h)anthracene	2.148			8.2	mg/kg	0.184	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.217			3.4	mg/kg	0.185	mg/kg	
	Cumulative Risks	16.987	0.00563						
2978ST RCRA hazardous	Constituents								
	Benzo(a)anthracene	0.418			3.4	mg/kg	0.358	mg/kg	
	Benzo(a)pyrene	3.669			3.4	mg/kg	0.314	mg/kg	
	Benzo(b)fluoranthene	0.544			6.8	mg/kg	0.466	mg/kg	
	Dibenzo(a,h)anthracene	2.028			8.2	mg/kg	0.174	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.206			3.4	mg/kg	0.177	mg/kg	
	Cumulative Risks	16.987	0.00563						
2977ST RCRA hazardous	Constituents								
	Benzo(a)anthracene	0.418			3.4	mg/kg	0.358	mg/kg	
	Benzo(a)pyrene	3.669			3.4	mg/kg	0.314	mg/kg	
	Benzo(b)fluoranthene	0.544			6.8	mg/kg	0.466	mg/kg	
	Dibenzo(a,h)anthracene	2.028			8.2	mg/kg	0.174	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.206			3.4	mg/kg	0.177	mg/kg	
	Cumulative Risks	16.582	0.00481						
2976ST RCRA hazardous	Constituents								
	Aroclor-1254	10.620			10	mg/kg	0.451	mg/kg	



Drum Number and Designation	Constituents	RCRA Risk Analysis Carcinogenic Ratio	RCRA Risk Analysis Noncarcinogenic Ratio	Inclusive Risk Analysis Noncarcinogenic Ratio	LDR Treatment Standard	Units	Analytical Results	Units	Comments
2973ST RCRA hazardous	Benzo(a)anthracene	0.302			3.4	mg/kg	0.259	mg/kg	
	Benzo(a)pyrene	2.842			3.4	mg/kg	0.243	mg/kg	
	Benzo(b)fluoranthene	0.360			6.8	mg/kg	0.308	mg/kg	
	Dibenzo(a,h)anthracene	2.148			8.2	mg/kg	0.184	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.217			3.4	mg/kg	0.185	mg/kg	
	Cumulative Risks	13.035	0.000924						
2972ST RCRA hazardous	Constituents								
	Aroclor-1254	10.559			10	mg/kg	0.0448	mg/kg	
	Benzo(a)anthracene	0.201			3.4	mg/kg	0.172	mg/kg	
	Benzo(a)pyrene	2.010			3.4	mg/kg	0.173	mg/kg	
	Benzo(b)fluoranthene	0.205			6.8	mg/kg	0.175	mg/kg	
	Cumulative Risks	13.398	0.000451						
2971ST RCRA hazardous	Constituents								
	Aroclor-1254	10.674			10	mg/kg	0.0453	mg/kg	
	Benzo(a)anthracene	0.207			3.4	mg/kg	0.178	mg/kg	
	Benzo(a)pyrene	2.044			3.4	mg/kg	0.175	mg/kg	
	Benzo(b)fluoranthene	0.207			6.8	mg/kg	0.177	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.212			8.2	mg/kg	0.182	mg/kg	
2970ST RCRA hazardous	Constituents								
	Aroclor-1254	10.620			10	mg/kg	0.0451	mg/kg	
	Benzo(a)anthracene	0.302			3.4	mg/kg	0.259	mg/kg	
	Benzo(a)pyrene	2.842			3.4	mg/kg	0.243	mg/kg	
	Benzo(b)fluoranthene	0.360			6.8	mg/kg	0.308	mg/kg	
	Dibenzo(a,h)anthracene	2.148			8.2	mg/kg	0.184	mg/kg	
2970ST RCRA hazardous	Indeno(1,2,3-cd)pyrene	0.217			3.4	mg/kg	0.185	mg/kg	
	Cumulative Risks	31.3516	0.00609						
	Constituents								
	Aroclor-1254	306.306			10	mg/kg	1.3	mg/kg	
	Benzo(a)anthracene	0.415			3.4	mg/kg	0.355	mg/kg	
	Benzo(a)pyrene	3.777			3.4	mg/kg	0.323	mg/kg	

Drum Number and Designation	Constituents	RCRA Risk Analysis Carcinogenic Ratio	RCRA Risk Analysis Noncarcinogenic Ratio	Inclusive Risk Analysis Noncarcinogenic Ratio	LDR Treatment Standard	Units	Analytical Results	Units	Comments
2969 ST RCRA hazardous	Benzo(b)fluoranthene	0.557				mg/kg	0.477	mg/kg	
	Dibenzo(a,h)anthracene	2.135				mg/kg	0.183	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.217				mg/kg	0.186	mg/kg	
	<b>Cumulative Risks</b>	<b>3.123</b>	<b>0.00103</b>						
	Constituents								
2968 ST RCRA hazardous	Aroclor-1254	10.657							
	Benzo(a)anthracene	0.209			10	mg/kg	0.0452	mg/kg	
	Benzo(a)pyrene	2.091			3.4	mg/kg	0.179	mg/kg	
	Benzo(b)fluoranthene	0.211			3.4	mg/kg	0.179	mg/kg	
	<b>Cumulative Risks</b>	<b>13.23</b>	<b>0.00105</b>		6.8	mg/kg	0.181	mg/kg	
2957 ST RCRA hazardous	Constituents								
	Aroclor-1254	10.657							
	Benzo(a)anthracene	0.209			10	mg/kg	0.0452	mg/kg	
	Benzo(a)pyrene	2.091			3.4	mg/kg	0.179	mg/kg	
	Benzo(b)fluoranthene	0.211			3.4	mg/kg	0.179	mg/kg	
2958 ST RCRA hazardous	<b>Cumulative Risks</b>	<b>13.23</b>	<b>0.00609</b>		6.8	mg/kg	0.181	mg/kg	
	Constituents								
	Aroclor-1254	306.306							
	Benzo(a)anthracene	0.415			10	mg/kg	1.3	mg/kg	
	Benzo(a)pyrene	3.777			3.4	mg/kg	0.355	mg/kg	
2958 ST RCRA hazardous	Benzo(b)fluoranthene	0.557			3.4	mg/kg	0.323	mg/kg	
	Dibenzo(a,h)anthracene	2.135			6.8	mg/kg	0.477	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.217			8.2	mg/kg	0.183	mg/kg	
	<b>Cumulative Risks</b>	<b>315.450</b>	<b>0.00707</b>		3.4	mg/kg	0.186	mg/kg	
	Constituents								
2958 ST RCRA hazardous	Aroclor-1254	306.306							
	Benzo(a)anthracene	0.598			10	mg/kg	1.3	mg/kg	
	Benzo(a)pyrene	5.334			3.4	mg/kg	0.512	mg/kg	
	Benzo(b)fluoranthene	0.779			3.4	mg/kg	0.457	mg/kg	
	Bis(2-ethylhexyl)phthalate	0.111			6.8	mg/kg	0.667	mg/kg	
2958 ST RCRA hazardous	Dibenzo(a,h)anthracene	2.052			28	mg/kg	0.26	mg/kg	
					8.2	mg/kg	0.176	mg/kg	

Drum Number and Designation	Constituents	RCRA Risk Analysis Carcinogenic Ratio	RCRA Risk Analysis Noncarcinogenic Ratio	Inclusive Risk Analysis Noncarcinogenic Ratio	LDR Treatment Standard	Units	Analytical Results	Units	Comments
2964 ST RCRA hazardous	Indeno(1,2,3-cd)pyrene	0.241			3.4	mg/kg	0.207	mg/kg	
	Cumulative Risks	1.313516	0.00609						
	Constituents								
	Aroclor-1254								
	Benzo(a)anthracene	306.306			10	mg/kg	1.3	mg/kg	
	Benzo(a)pyrene	0.415			3.4	mg/kg	0.355	mg/kg	
	Benzo(b)fluoranthene	3.777			3.4	mg/kg	0.323	mg/kg	
2962 ST RCRA hazardous	Dibenzo(a,h)anthracene	0.557			6.8	mg/kg	0.477	mg/kg	
	Indeno(1,2,3-cd)pyrene	2.135			8.2	mg/kg	0.183	mg/kg	
	Cumulative Risks	0.217			3.4	mg/kg	0.186	mg/kg	
	Constituents								
	Aroclor-1254	306.306							
	Benzo(a)pyrene	2.219			10	mg/kg	1.3	mg/kg	
	Benzo(b)fluoranthene	0.292			3.4	mg/kg	0.19	mg/kg	
3009 ST RCRA hazardous	Bis(2-ethylhexyl)phthalate	0.111			6.8	mg/kg	0.25	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.164			28	mg/kg	0.26	mg/kg	
	Cumulative Risks	0.27434	0.0923		3.4	mg/kg	0.14	mg/kg	
	Constituents								
	Aroclor-1254	38.877							
	Benzo(a)anthracene	0.453			10	mg/kg	0.165	mg/kg	
	Benzo(a)pyrene	4.638			3.4	mg/kg	0.388	mg/kg	
3008 ST RCRA hazardous	Benzo(b)fluoranthene	0.479			3.4	mg/kg	0.397	mg/kg	
	Bis(2-ethylhexyl)phthalate	0.556			6.8	mg/kg	0.41	mg/kg	
	Dibenzo(a,h)anthracene	4.038			28	mg/kg	1.297	mg/kg	
	Hexachlorobenzene	22.906			8.2	mg/kg	0.346	mg/kg	
	Indeno(1,2,3-cd)pyrene	0.439			10	mg/kg	0.468	mg/kg	
	Cumulative Risks	0.72434	0.0923		3.4	mg/kg	0.376	mg/kg	
	Constituents								
	Aroclor-1254	38.877							
	Benzo(a)anthracene	0.453			10	mg/kg	0.165	mg/kg	
	Benzo(a)pyrene	4.639			3.4	mg/kg	0.388	mg/kg	

Operable Unit 7 ID# Drum Numbers

				DRUM #	WELL #		WEMS #	DRUM SIZE
12/2/92	ST	OU7		2425	70693	C YARD	E04084999903944	30
12/2/92	ST	OU7		2426	70693	C YARD	E04086999903946	30
12/2/92	ST	OU7		2427	70693	C YARD	E04085999903945	30
12/2/92	ST	OU7		2428	70693	C YARD	E04083999903943	30
12/3/92	ST	OU7		2435	70693	C YARD	E04030999903890	30
12/3/92	ST	OU7		2436	70693	C YARD	E04029999903889	30
12/3/92	ST	OU7		2437	70693	C YARD	E04031999903891	30
12/7/92	ST	OU7		2438	70893	C YARD	E04073999903934	30
12/7/92	ST	OU7		2439	70893	C YARD	E04073999903933	30
12/3/92	ST	OU7		2440	70693	C YARD	E04090999903950	30
12/4/92	ST	OU7		2448	70693	C YARD	E04087999903947	30
12/4/92	ST	OU7		2451	70692	C YARD	E04089999903949	30
12/8/92	ST	OU7		2452	70893	C YARD	E04078999903938	30
12/8/92	ST	OU7		2453	70893	C YARD	E04071999903931	30
12/7/92	ST	OU7		2454	70893	C YARD	E04067999903927	30
12/8/92	ST	OU7		2455	70893	C YARD	E04072999903932	30
12/8/92	ST	OU7		2456	70893	C YARD	E04077999903937	30
12/8/92	ST	OU7		2457	70893	C YARD	E04069999903929	30
12/8/92	ST	OU7		2472	70893	C YARD	E04081999903941	30
12/8/92	ST	OU7		2473	70893	C YARD	E04082999903942	30
12/8/92	ST	OU7		2474	70893	C YARD	E04075999903935	30
12/8/92	ST	OU7		2475	70893	C YARD	E04076999903936	30
12/9/92	ST	OU7		2476	70293	C YARD	E04126999903986	30
12/9/92	ST	OU7		2477	70293	C YARD	E04125999903985	30
12/8/92	ST	OU7		2478	70993	C YARD	E04063999903923	30
12/9/92	ST	OU7		2479	70893	C YARD	E04064999903924	30
12/8/92	ST	OU7		2480	70893	C YARD	E04070999903930	30
12/10/92	ST	OU7		2490	70293	C YARD	E04123999903983	30
12/10/92	ST	OU7		2491	70293	C YARD	E04128999903988	30
12/10/92	ST	OU7		2492	70293	C YARD	E04127999903987	30
12/10/92	ST	OU7		2493	70293	C YARD	E04129999903989	30
12/10/92	ST	OU7		2496	70293	C YARD	E04130999903990	30

12/11/92	ST	OU7	2497	70293	C YARD	E04134999903994	30
12/11/92	ST	OU7	2498	70293	C YARD	E04133999903993	30
12/10/92	ST	OU7	2499	70293	C YARD	E04124999903984	30
12/11/92	ST	OU7	2500	70293	C YARD	E04132999903992	30
12/14/92	ST	OU7	2508	70293	C YARD	E04131999903991	30
1/12/93	ST	OU7	2509	70093	C YARD	E04100999903960	30
12/14/92	ST	OU7	2510	70293	C YARD	E04119999903979	30
12/14/92	ST	OU7	2511	70293	C YARD	E04120999903980	30
12/14/92	ST	OU7	2512	70293	C YARD	E04121999903981	30
12/16/92	ST	OU7	2513	70293	C YARD	E04116999903976	30
12/16/92	ST	OU7	2516	70293	C YARD	E04118999903978	30
12/16/92	ST	OU7	2533	70293	C YARD	E04117999903977	30
12/16/92	ST	OU7	2535	70293	C YARD	E04115999903975	30
1/8/93	ST	OU7	2539	70293	C YARD	E04098999903958	30
12/16/92	ST	OU7	2542	70293	C YARD	E04122999903982	30
12/22/92	ST	OU7	2553	70893	C YARD	E04060999903920	30
12/22/92	ST	OU7	2554	70893	C YARD	E04065999903925	30
12/23/92	ST	OU7	2563	70893	C YARD	E04068999903928	30
12/23/92	ST	OU7	2567	70893	C YARD	E04066999903926	30
1/5/93	ST	OU7	2582	70893	C YARD	E04080999903940	30
1/5/93	ST	OU7	2584	70893	C YARD	E04035999903895	30
1/5/93	ST	OU7	2589	70893		E04088999903948	30
1/5/93	ST	OU7	2595	70893	C YARD	E04033999903893	30
1/6/93	ST	OU7	2596	70893	C YARD	E04079999903939	30
1/5/93	ST	OU7	2598	70893	C YARD	E04034999903894	30
1/8/93	ST	OU7	2611	70293	C YARD	E04096999903956	30
1/11/93	ST	OU7	2626	70293	C YARD	E04097999903957	30
1/11/93	ST	OU7	2629	70293	C YARD	E04095999903955	30
1/12/93	ST	OU7	2634	70093	C YARD	E04102999903962	30
1/12/93	ST	OU7	2635	70093	C YARD	E04099999903959	30
1/13/93	ST	OU7	2636	70193	C YARD	E04104999903964	30
1/13/93	ST	OU7	2637	70193	C YARD	E04105999903965	30
1/14/93	ST	OU7	2638	70193	C YARD	E04106999903966	30

1/14/93	ST	OU7	2639	70193	CYARD	E04103999903963	30
1/14/93	ST	OU7	2640	70193	CYARD	E04108999903968	30
1/14/93	ST	OU7	2641	70193	CYARD	E04107999903967	30
1/15/93	ST	OU7	2649	70193	CYARD	E04110999903970	30
1/15/93	ST	OU7	2650	70193	CYARD	E04109999903969	30
1/15/93	ST	OU7	2651	70193	CYARD	E04111999903971	30
1/15/93	ST	OU7	2652	70193	CYARD	E04112999903972	30
1/15/93	ST	OU7	2653	70193	CYARD	E04113999903973	30
1/15/93	ST	OU7	2654	70193	CYARD	E04114999903974	30
1/19/93	ST	OU7	2655	70593	CYARD	E04057999903917	30
1/15/93	ST	OU7	2656	70193	CYARD	E04101999903961	30
1/19/93	ST	OU7	2681	70593	CYARD	E04056999903916	30
1/19/93	ST	OU7	2682	70593	CYARD	E04055999903915	30
1/19/93	ST	OU7	2683	70593	CYARD	E04058999903918	30
1/19/93	ST	OU7	2684	70593	CYARD	E04054999903914	30
1/19/93	ST	OU7	2685	70593	CYARD	E04049999903909	30
1/18/93	ST	OU7	2686	70593	CYARD	E04061999903921	30
1/19/93	ST	OU7	2687	70593	CYARD	E04045999903905	30
1/19/93	ST	OU7	2688	70593	CYARD	E04044999903904	30
1/19/93	ST	OU7	2693	70593	CYARD	E04046999903906	30
1/20/93	ST	OU7	2694	70593	CYARD	E04051999903911	30
1/20/93	ST	OU7	2695	70593	CYARD	E04052999903912	30
1/20/93	ST	OU7	2696	70593	CYARD	E04047999903907	30
1/20/93	ST	OU7	2697	70593	CYARD	E04048999903908	30
1/26/93	ST	OU7	2698	70593	CYARD	E04050999903910	30
1/25/93	ST	OU7	2699	70593	CYARD	E03972999903832	30
1/22/93	ST	OU7	2700	70593	CYARD	E04053999903913	30
1/25/93	ST	OU7	2706	70593	CYARD	E03942999903802	30
1/25/93	ST	OU7	2707	70593	CYARD	E03973999903833	30
1/25/93	ST	OU7	2711	70593	CYARD	E03940999903800	30
1/25/93	ST	OU7	2712	70593	CYARD	E03970999903830	30
1/26/93	ST	OU7	2876	70593	CYARD	E03941999903801	30
1/26/93	ST	OU7	2878	70593	CYARD	E03971999903831	30

1/27/93	ST	OU7	2883	70593	CYARD	E04042999903902	30
1/27/93	ST	OU7	2884	70593	CYARD	E04041999903901	30
1/27/93	ST	OU7	2885	70593	CYARD	E04043999903903	30
1/27/93	ST	OU7	2886	70593	CYARD	E04040999903900	30
1/27/93	ST	OU7	2887	70593	CYARD	E03982999903842	30
1/27/93	ST	OU7	2888	70593	CYARD	E03985999903845	30
1/27/93	ST	OU7	2889	70593	CYARD	E03984999903844	30
1/27/93	ST	OU7	2890	70593	CYARD	E03983999903843	30
1/27/93	ST	OU7	2891	70593	CYARD	E03979999903839	30
1/27/93	ST	OU7	2892	70593	CYARD	E03980999903840	30
1/27/93	ST	OU7	2893	70593	CYARD	E03978999903838	30
1/27/93	ST	OU7	2894	70593	CYARD	E03981999903841	30
1/30/93	ST	OU7	2895	70493	CYARD	E04062999903922	30
1/28/93	ST	OU7	2896	70593	CYARD	E03976999903836	30
1/30/93	ST	OU7	2908	70493	CYARD	E04059999903919	30
1/30/93	ST	OU7	2909	70493	CYARD	E03975999903835	30
1/30/93	ST	OU7	2910	70493	CYARD	E04138999903998	30
1/30/93	ST	OU7	2911	70493	CYARD	E04135999903995	30
2/1/93	ST	OU7	2912	70493	CYARD	E04137999903997	30
2/1/93	ST	OU7	2913	70493	CYARD	E04094999903954	30
2/1/93	ST	OU7	2914	70393	CYARD	E04093999903953	30
2/2/93	ST	OU7	2915	70393	CYARD	E04136999903996	30
2/2/93	ST	OU7	2916	70393	CYARD	E04092999903952	30
2/2/93	ST	OU7	2917	70393	CYARD	E04091999903951	30
2/3/93	ST	OU7	2918	70993	CYARD	E04145999904005	30
2/3/93	ST	OU7	2919	70993	CYARD	E04162999904022	30
2/3/93	ST	OU7	2920	70993	CYARD	E04140999904000	30
2/3/93	ST	OU7	2921	70993	CYARD	E04142999904002	30
2/4/93	ST	OU7	2946	71093	CYARD	E04139999903999	30
2/4/93	ST	OU7	2947	71093	CYARD	E04146999904006	30
2/4/93	ST	OU7	2948	71093	CYARD	E04163999904023	30
2/4/93	ST	OU7	2949	71093	CYARD	E04212999904072	30
2/5/93	ST	OU7	2950	71093	CYARD	E04165999904025	30

2/5/93	5/31/94	ST	OU7	2951	71093	BLDG 223	E04141999904001	30
2/8/93	4/6/93	ST	OU7	2957	71993	18.03	E00468999900467	30
2/9/93	4/6/93	ST	OU7	2958	71993	18.03	E00469999900468	30
2/9/93	4/6/93	ST	OU7	2959	72093	CYARD	E00491999900490	30
2/9/93	4/6/93	ST	OU7	2960	71993	18.03	E00493999900492	30
2/9/93	4/6/93	ST	OU7	2961	71993	18.03	E00476999900475	30
2/9/93	4/6/93	ST	OU7	2962	71993	18.03	E00486999900485	30
2/9/93	4/18/95	ST	OU7	2963	71993	18.03	E00473999900472	30
2/9/93	4/6/93	ST	OU7	2964	71993	18.03	E00483999900482	30
2/11/93	4/8/93	ST	OU7	2968	71193	18.03	E00510999900509	30
2/9/93	4/6/93	ST	OU7	2969	71993	18.03	E00474999900473	30
2/9/93	4/6/93	ST	OU7	2970	71993	18.03	E00485999900484	30
2/11/93	4/6/93	ST	OU7	2971	72093	18.03	E00471999900470	30
2/10/93	4/6/93	ST	OU7	2972	72093	18.03	E00478999900477	30
2/10/93	4/8/93	ST	OU7	2973	71193	18.03	E00509999000508	30
2/11/93	4/8/93	ST	OU7	2974	71193	CYARD	E00507999900506	30
2/11/93	4/8/93	ST	OU7	2975	71193	CYARD	E00504999900503	30
2/11/93	4/8/93	ST	OU7	2976	71193	CYARD	E00506999900505	30
2/12/93	4/6/93	ST	OU7	2977	72093	18.04	E00487999900486	30
2/11/93	4/6/93	ST	OU7	2978	72093	18.03	E00475999900474	30
2/11/93	4/6/93	ST	OU7	2979	72093	18.03	E00490999900489	30
2/12/93	4/6/93	ST	OU7	2980	72093	18.03	E00489999900488	30
2/18/93	4/6/93	ST	OU7	2981	72393	18.03	E00492999900491	30
2/18/93	5/26/94	ST	OU7	2982	71393	18.03	E00439999900438	30
2/12/92	4/1/93	ST	OU7	2983	71393	18.03	E00442999900441	30
2/18/93	4/1/93	ST	OU7	2984	71393	CYARD	E00441999900440	30
2/18/93	4/6/93	ST	OU7	2994	72393	18.03	E00472999900471	30
2/18/93	4/6/93	ST	OU7	2995	72393	18.03	E00466999900465	30
2/18/93	5/26/94	ST	OU7	2996	72393	18.03	E00470999900469	30
2/19/93	4/18/95	ST	OU7	2997	72393	18.03	E00488999900487	30
2/20/93	4/6/93	ST	OU7	2998	71993	18.03	E00495999900494	30
2/20/93	4/6/93	ST	OU7	2999	71993	18.03	E00467999900466	30
2/18/93	4/8/93	ST	OU7	3000	71393	18.03	E00503999900502	30



2/18/93	4/1/93	ST	OU7	3001	71393	18.03	E00440999900439	30
2/18/93	4/8/93	ST	OU7	3002	71393	18.03	E00511999900510	30
2/18/93	4/1/93	ST	OU7	3003	71393	18.03	E00438999900437	30
2/18/93	4/1/93	ST	OU7	3004	71393	18.03	E00437999900436	30
2/20/93	4/8/93	ST	OU7	3005	71493	18.03	E00512999900511	30
2/20/93	4/8/93	ST	OU7	3006	71493	18.03	E00502999900501	30
2/20/93	4/8/93	ST	OU7	3007	71493	CYARD	E00508999900507	30
2/22/93	4/1/93	ST	OU7	3008	71493	18.03	E00443999900442	30
2/20/93	4/8/93	ST	OU7	3009	71493	18.03	E00505999900504	30
2/22/93	4/1/93	ST	OU7	3010	72193	18.03	E00427999900426	30
2/23/93	4/1/93	ST	OU7	3011	72193	18.03	E00423999900422	30
2/23/93	4/1/93	ST	OU7	3012	72193	18.03	E00426999900425	30
2/23/93	4/1/93	ST	OU7	3013	72193	18.03	E00425999900424	30
2/23/93	4/6/93	ST	OU7	3014	72193	18.03	E00484999900483	30
2/23/93	4/6/93	ST	OU7	3015	72193	18.03	E00477999900476	30
2/23/93	4/8/93	ST	OU7	3016	71393	CYARD	E00501999900500	30
2/24/93	4/1/93	ST	OU7	3017	71493	CYARD	E00435999900434	30
2/24/93	4/1/93	ST	OU7	3018	71493	CYARD	E00434999900433	30
2/24/93	4/1/93	ST	OU7	3019	71493	CYARD	E00444999900443	30
2/25/93	4/1/93	ST	OU7	3020	71793	CYARD	E00454999900453	30
2/25/93	4/1/93	ST	OU7	3021	71793	CYARD	E00431999900430	30
2/25/93	4/1/93	ST	OU7	3022	71793	CYARD	E00450999900449	30
2/23/93	4/6/93	ST	OU7	3023	72193	18.03	E00479999900478	30
2/23/93	4/6/93	ST	OU7	3024	72193	18.04	E00481999900480	30
2/23/93	4/1/93	ST	OU7	3025	72193	18.03	E00422999900421	30
2/23/93	4/1/93	ST	OU7	3026	72193	18.03	E00459999900458	30
2/23/93	4/1/93	ST	OU7	3027	72193	18.03	E00421999900420	30
2/23/93	4/1/93	ST	OU7	3028	72193	18.03	E00424999900423	30
2/24/93	4/1/93	ST	OU7	3029	72293	18.03	E00460999900459	30
2/24/93	4/1/93	ST	OU7	3030	72293	18.03	E00458999900457	30
2/25/93	5/26/94	ST	OU7	3031	72493	18.03	E00480999900479	30
2/25/93	4/18/95	ST	OU7	3032	72493	18.03	E00482999900481	30
2/26/93	4/1/93	ST	OU7	3033	72193	18.03	E00457999900456	30

2/27/93	4/1/93	ST	OU7	3034	72193	18.03	E00455999900454	30
2/26/93	4/1/93	ST	OU7	3035	71793	18.03	E00429999900428	30
2/26/93	4/1/93	ST	OU7	3036	71793	CYARD	E00433999900432	30
2/26/93	4/1/93	ST	OU7	3037	71793	CYARD	E00432999900431	30
2/26/93	4/1/93	ST	OU7	3038	71793	CYARD	E00451999900450	30
2/27/93	4/1/93	ST	OU7	3039	72193	18.03	E00456999900455	30
3/1/93	4/6/93	ST	OU7	3040	71593	18.03	E00462999900461	30
3/2/93	4/6/93	ST	OU7	3041	71593	18.03	E00499999900498	30
3/2/93	4/6/93	ST	OU7	3042	71593	18.03	E00464999900463	30
2/26/93	4/1/93	ST	OU7	3045	71793	CYARD	E00448999900447	30
2/26/93	4/1/93	ST	OU7	3046	71793	CYARD	E00446999900445	30
2/26/93	4/1/93	ST	OU7	3047	71793	CYARD	E00436999900435	30
2/26/93	4/1/93	ST	OU7	3048	71793	CYARD	E00449999900448	30
3/2/93	4/1/93	ST	OU7	3049	71793	CYARD	E00445999900444	30
2/27/93	4/1/93	ST	OU7	3050	71893	18.03	E00452999900451	30
2/27/93	4/1/93	ST	OU7	3051	71893	CYARD	E00453999900452	30
3/1/93	4/1/93	ST	OU7	3052	71793	CYARD	E00430999900429	30
3/1/93	4/1/93	ST	OU7	3053	71893	CYARD	E00428999900427	30
3/2/93	4/1/93	ST	OU7	3054	71793	CYARD	E00447999900446	30
3/2/93	4/6/93	ST	OU7	3055	71693	18.03	E00500999900499	30
3/3/93	4/6/93	ST	OU7	3056	71693	18.03	E00494999900493	30
3/3/93	4/6/93	ST	OU7	3057	71593	CYARD	E00498999900497	30
3/2/93	4/6/93	ST	OU7	3063	71593	CYARD	E00463999900462	30
3/2/93	4/6/93	ST	OU7	3064	71593	18.03	E00496999900495	30
3/2/93	4/6/93	ST	OU7	3065	71593	18.03	E00465999900464	30
3/2/93	4/6/93	ST	OU7	3066	71593	18.03	E00497999900496	30
3/3/93	4/6/93	ST	OU7	3067	71593	18.03	E00461999900460	30

12/18